

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS

FILED  
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NORTHERN DISTRICT OF ILLINOIS

[caption]

SEP 14 2018

NOTICE OF MOTION

JEFFREY P. ALLSTEADT, CLERK

TO: See attached list

PLEASE TAKE NOTICE that on Thur Sept. 27, 2018 at 9 a.m./p.m., I will appear before the Honorable Thomas Lynch, or any judge sitting in that judge's place, in courtroom 306 in the Rockford Northern District of IL 227 S. Charles St.  
6101 Illinois, and present the motion of Motion for Sanctions [to/ for]  
GTA Galena Territory Association, a copy of which is attached.

[Name of movant]

By: Robert Sam 802-777-4191  
[Name, address, telephone number, 7 Colony Ct  
and email address of counsel] Galena IL 61036

CERTIFICATE OF SERVICE

I, Robert Sam, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on September 14, 2018, at 2:00 a.m./p.m.

TOC Matthews  
815-777-2000  
2000 Territory Dr.  
Orlando FL 32816

Peter Winter  
Browns Law Firm  
3785 Stockdale Road  
Rock Island FL 32101  
309-786-4900

In the United States Bankruptcy Court  
Northern District Of Illinois

Robert sam.  
Defendant

Case number 18-01003  
81910

Vs  
GTA or Galena Territory Association  
Also known as The Owners Club

**PLAINTIFF'S MOTION FOR SANCTIONS**

COMES NOW Plaintiff Robert Sam for his Motion for Sanctions against Defendant The GTA pursuant to Federal Bankruptcy court of Iowa and Illinois Court Rule 11 U.S. Code § 362 - Automatic stay and states the following:

1. Plaintiff is entitled to Sanctions against The GTA for conduct which Plaintiff contends constitutes violations of the stay act and health conditions . The evidence supports that by clear and convincing evidence that The GTA intentionally and willfully violated the 362 automatic stay rule to further collection on a judgement. The evidence further supports that

The GTA did so by cutting off access to the GTA refuge facility.

Facts:

1. Mr. Sam filed his Bankruptcy on August 10th 2018 and received the courts stay power for 30 days.
2. Mr. Sam delivered a copy of the stay to The GTA and the sheriffs office.
3. In August 11th access to the refuge facility was terminated.
4. The GTA violated rule 11 code 362 to punish Mr. Sam for filing his bankruptcy.

Summary and conclusion:

5. The United States Bankruptcy court Rule 11 code 362 authorizes this Court to impose various sanctions for stay abuse, including but not limited to, sanctions and damages.
6. Mr. Sam is mailing a copy of the motion to the GTA and the GTA's lawyer and well as emailing a copy to the GTA manager Joe Mattingley and emailing a copy to there attorney Mr. Wanker. This will constitute proper service.

Robert sam  
802-777-4191  
7 Colony Ct  
Galena Illinois 61036.

